

## UNITED STATES DISTRICT COURT

APR 10 2014

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Manuel CASAS

YOB: 1980

COB: USA

Case No. M-14-0694-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 9, 2014 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Knowingly and Intentionally Possess With Intent to Distribute a Controlled Substance/Approximately 18.82 kilograms of Cocaine, a Schedule II Controlled Substance under the Controlled Substance Act.
21 U.S.C. § 952	Importation of a Controlled Substance/Approximately 18.82 kilograms of Cocaine, a Schedule II Controlled Substance under the Controlled Substance Act.

This criminal complaint is based on these facts:

See "Attachement A"

☒ Continued on the attached sheet.

Approved + LG.  
 J. V. Ormsby  
 MJS  
 4-10-14



Complainant's signature

Ryan Serge, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/10/2014 8:50 am


Judge's signature

City and state: McAllen, Texas

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On April 9, 2014, at approximately 10:20 hours, a black 2004 Pontiac Grand Prix (Texas license plate: DCX 1200) driven by Manuel CASAS attempted to make entry into the United States via the Hidalgo, Texas Port of Entry (Hidalgo POE). A Customs and Border Protection Officer (CBPO) received a negative declaration from CASAS. The CBPO observed that CASAS was very nervous and visibly shaking. The CBPO asked CASAS to open the trunk. CASAS was unable to find the button to open the trunk so the CBPO asked for the keys to the vehicle. The CBPO received the key to the vehicle and noticed that it was a single key. The CBPO subsequently referred the vehicle for secondary inspection.

Moments later at secondary inspection, a CBPO encountered CASAS and obtained another negative declaration from CASAS. The CBPO subsequently took the vehicle to undergo a Vehicle and Cargo Inspection System (VACIS) scan.

The VACIS scan revealed anomalies in the floor area of the vehicle. CBPOs subsequently requested assistance from a Canine Enforcement Officer (CEO).

A CEO and his assigned narcotics / human detection canine (Mike, CK-69) responded. The CEO observed Mike alert to the odor of narcotics / humans in the undercarriage area just beneath the rocker panel.

Further inspection revealed sixteen (16) packages in the driver side rocker panel and fifteen (15) packages in the passenger side rocker panel. A total of thirty-one (31) packages, weighing 18.82 kilograms, containing white powdery substance that field-tested positive for the properties of cocaine were removed.

Homeland Security Investigations, McAllen, Texas (HSI McAllen) Special Agents (SAs) were notified and responded. HSI McAllen SAs conducted an interview of CASAS. In a post-Miranda statement, CASAS stated that he previously agreed to transport narcotics into the United States. CASAS stated that he was going to drive the vehicle to Houston, Texas and that he was going to be paid \$3,000 after returning to Mexico.